UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GM PHOTO, LLC,

Plaintiff,

v.

FOCUS CAMERA, INC., MICHAEL SILBERSTEIN, and CHASSY KIRZNER,

Defendants.

Civil Action No.: 22-cv-10339 (VSB)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, Wilson Elser Moskowitz Edelman & Dicker LLP, attorneys for Defendants FOCUS CAMERA, INC., MICHAEL SILBERSTEIN, and CHASSY KIRZNER, as supported by all pleadings and proceedings had heretofore herein, hereby moves this Court, before the Hon. Vernon S. Broderick at the United States District Court, 40 Foley Square, New York, NY 10007, for an order pursuant to Fed. R. Civ. P. 12(c) for judgment on the pleadings dismissing Plaintiff's Complaint, in its entirety, together with such further and other relief as this Court may deem just.

Dated: New York, New York February 9, 2023

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP

By:

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